

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Fred's, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-11984 (CTG)
(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MARCH 3, 2023, AT 10:00 A.M. (EASTERN TIME)**

***AS THERE ARE NO MATTERS GOING FORWARD, THE HEARING HAS
BEEN CANCELED WITH PERMISSION FROM THE COURT.***

ADJOURNED MATTERS:

1. Motion for Relief from Automatic Stay to Proceed with State Court Action, filed by Mae Bell Galloway [Filed 6/9/20] ([Docket No. 1172](#))

Objection/Response Deadline: June 16, 2020 at 4:00 p.m. (ET); extended to seven (7) calendar days before the next omnibus hearing date for the Liquidating Trustee.

Objections/Responses Received: None as of the date hereof.

Related Documents:

A. Notice of Hearing [Filed 6/9/20] ([Docket No. 1173](#))

Status: The parties have reached resolution subject to documentation.

2. Liquidating Trustee's First Omnibus (Non-Substantive) Objection to Certain (i) Late Filed Claims, (ii) Duplicate Claims, (iii) Amended and Superseded Claims, and (iv) Insufficient Documentation Claims [Filed 6/23/22] ([Docket No. 1687](#))

Objection/Response Deadline: July 27, 2022 at 4:00 p.m. (ET)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Fred's, Inc. (4010); Fred's Stores of Tennessee, Inc. (9888); National Equipment Management and Leasing, Inc. (4296); National Pharmaceutical Network, Inc. (9687); Reeves-Sain Drug Store, Inc. (4510); Summit Properties-Jacksboro, LLC (9161); Summit Properties-Bridgeport, LLC (2200); and 505 N. Main Opp, LLC (5850). The Debtors' current mailing address is c/o FI Liquidating Trust, 27 Crimson King Drive, Bear, DE 19701.

Objections/Responses Received:

- A. Response to Liquidating Trustee's First Omnibus (Non-Substantive) Objection to Certain (i) Late Filed Claims, (ii) Duplicate Claims, (iii) Amended and Superseded Claims, and (iv) Insufficient Documentation Claims. Filed by Forris Anderson [Filed 7/12/22] ([Docket No. 1694](#))

Related Documents:

- A. Notice of Submission of Proof of Claim in Connection with the Liquidating Trustee's First Omnibus (Non-Substantive) Objection to Certain (i) Late Filed Claims, (ii) Duplicate Claims, (iii) Amended and Superseded Claims, and (iv) Insufficient Documentation Claims [Filed 7/20/22] ([Docket No. 1705](#))
- B. [Signed] Order Sustaining Liquidating Trustee's First Omnibus (Non-Substantive) Objection to Certain (i) Late Filed Claims, (ii) Duplicate Claims, (iii) Amended and Superseded Claims, and (iv) Insufficient Documentation Claims [Filed 8/1/22] ([Docket No. 1710](#))

Status: The response of Forris Anderson has been adjourned to the next omnibus hearing date.

RESOLVED MATTER:

- 3. Liquidating Trustee's Motion for an Order Approving Settlement Between Liquidating Trustee and Chubb Pursuant to Fed. R. Bankr. P. 9019 [Filed 2/7/23] (Docket No. 1787)

Objection/Response Deadline: February 21, 2023, at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Liquidating Trustee's Motion for an Order Approving Settlement Between Liquidating Trustee and Chubb Pursuant to Fed. R. Bankr. P. 9019 [Filed 2/22/23] (Docket No. 1795)
- B. [Signed] Order Approving Settlement Between Liquidating Trustee and Chubb Pursuant to Fed. R. Bankr. P. 9019 [Filed 2/23/23] (Docket No. 1797)

Status: The Court has entered the order on this matter, and it is now resolved.

Dated: March 1, 2023
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Ericka F. Johnson

Matthew P. Ward, Esq. (No. 4471)
Ericka F. Johnson, Esq. (No. 5024)
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330
E-mail: matthew.ward@wbd-us.com
ericka.johnson@wbd-us.com

-and-

LOWENSTEIN SANDLER LLP

Jeffrey L. Cohen, Esq. (admitted *pro hac vice*)
Lindsay H. Sklar, Esq. (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
Email: jcohen@lowenstein.com
lsklar@lowenstein.com

Colleen Restel, Esq. (admitted *pro hac vice*)
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone: (973) 597-2502
Facsimile: (973) 597-2400
Email: crestel@lowenstein.com

-and-

ASK LLP

Joseph L. Steinfeld, Jr., Esq., MN SBN 0266292
Kara E. Casteel, Esq. MN SBN 0389115
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: 651-289-3846
Fax: (651) 406-9676
Email: kcasteel@askllp.com

Counsel to the Liquidating Trustee